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20  
21 Attorneys for Plaintiff  
22 UNITED STATES OF AMERICA

23  
24 UNITED STATES DISTRICT COURT

25 FOR THE CENTRAL DISTRICT OF CALIFORNIA

26 UNITED STATES OF AMERICA,

27 No. 2:18-CR-00173 (A) -GW-2

28 Plaintiff,

[PROPOSED] STATEMENTS OF THE CASE

v.

Trial Date: August 2, 2022

JOSE LANDA-RODRIGUEZ, et al.,  
18 [#2-GABRIEL ZENDEJAS-CHAVEZ]

Trial Time: 8:30 a.m.

19 Defendants.

Location: Courtroom of the  
Honorable George H.  
Wu

20  
21 Plaintiff United States of America, by and through its counsel  
22 of record, the United States Attorney for the Central District of  
23 California and Assistant United States Attorneys Shawn J. Nelson,  
24 Gregory Bernstein, Keith D. Ellison, and Gregg E. Marmaro, and  
25 defendant Gabriel Zendejas-Chavez, by and through his counsel of

26 ///

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1 record, Meghan Blanco, hereby submit their respective Proposed  
2 Statements of the Case.

3 Dated: July 27, 2022

Respectfully submitted,

4 STEPHANIE S. CHRISTENSEN  
5 Acting United States Attorney

6 SCOTT M. GARRINGER  
7 Assistant United States Attorney  
Chief, Criminal Division

8 /s/

9 SHAWN J. NELSON  
10 GREGORY BERNSTEIN  
11 KEITH D. ELLISON  
12 GREGG E. MARMARO  
13 Assistant United States Attorneys

14 Dated: July 27, 2022 /s/ via email authorization  
15 MEGHAN A. BLANCO  
16 Attorney for Defendant  
17 GABRIEL ZENDEJAS-CHAVEZ

**JOINT STATEMENT OF THE CASE (Pre-Voir Dire)<sup>1</sup>**

2 [Defendant] Gabriel Zendejas-Chavez is charged with violations  
3 of federal criminal law, including racketeering on behalf of the  
4 Mexican Mafia and drug trafficking. In particular, the First  
5 Superseding Indictment alleges that [Defendant] Gabriel Zendejas-  
6 Chavez would use his position as an attorney to assist Mexican Mafia  
7 members and other co-conspirators with criminal activities inside and  
8 outside the Los Angeles County Jail System. The Indictment is not  
9 evidence. [Defendant] Gabriel Zendejas-Chavez has entered a plea of  
10 not guilty to each of the charges against him and is presumed  
11 innocent.

<sup>1</sup> Defendant objects to the use of the term "defendant" throughout the proposed statement.

1 **GOVERNMENT'S PROPOSED STATEMENT OF THE CASE (Post-Voir Dire)**

2 The First Superseding Indictment ("Indictment") charges  
3 defendant Gabriel Zendejas-Chavez ("defendant") with violations of  
4 federal criminal law. The Indictment is not evidence. Defendant has  
5 entered a plea of not guilty to each of the charges against him.

6 The Indictment alleges that defendant conspired with others to  
7 conduct or to participate in the affairs of the Mexican Mafia's Los  
8 Angeles County Jail System ("LACJ") Enterprise through a pattern of  
9 racketeering activity, including acts involving murder, extortion,  
10 drug trafficking, witness intimidation, witness retaliation, and  
11 money laundering.

12 As set forth in the Indictment, the Mexican Mafia LACJ  
13 Enterprise operated for the benefit of the Mexican Mafia member or  
14 members deemed by the Mexican Mafia to be in control of the LACJ.  
15 The Mexican Mafia LACJ Enterprise operated within LACJ facilities and  
16 in some surrounding neighborhoods by imposing the rules of the  
17 Mexican Mafia on inmates within LACJ facilities and on members of  
18 predominantly Hispanic street gangs. Using the methods of the  
19 Mexican Mafia, the Mexican Mafia LACJ Enterprise controlled drug  
20 trafficking activities and the distribution of drug trafficking  
21 proceeds, extortion, and the enforcement of Mexican Mafia rules  
22 (which were used as a basis for extortion) within LACJ custody  
23 facilities and in some surrounding neighborhoods.

24 The Indictment alleges that defendant acted as a facilitator,  
25 that is, a highest-level associate, for the Mexican Mafia members who  
26 controlled the Mexican Mafia LACJ Enterprise and would act with the  
27 authority of those members in directing the criminal activities of  
28 the Mexican Mafia LACJ Enterprise, including extortion and drug

1 sales. In particular, the Indictment alleges that defendant would  
2 use his position as an attorney to assist Mexican Mafia Member Jose  
3 Landa-Rodriguez, another now-deceased Mexican Mafia member, and other  
4 co-conspirators, with criminal activities inside and outside the Los  
5 Angeles County Jail System.

6 Defendant is charged in four counts of the Indictment.

7 Count One charges defendant with conspiring to violate the  
8 federal Racketeer Influenced and Corrupt Organizations Act, also  
9 known as "RICO".

10 Count Five charges defendant with conspiring to distribute  
11 methamphetamine, heroin, cocaine, and marijuana. Count Five further  
12 alleges that the overall conspiracy, to which defendant was a member,  
13 involved the following:

14 (1) at least 500 grams of a mixture and substance containing a  
15 detectable amount of methamphetamine;

16 (2) at least 50 grams of methamphetamine;

17 (3) at least 100 grams of a mixture and substance containing a  
18 detectable amount of heroin;

19 (4) cocaine; and

20 (5) marijuana.

21 Count Seven charges defendant with aiding and abetting the  
22 possession with intent to distribute of approximately 7.75 grams of  
23 methamphetamine.

24 Count Eight charges defendant with aiding and abetting the  
25 possession with intent to distribute of approximately 2.37 grams of a  
26 mixture and substance containing a detectable amount of heroin.

DEFENDANT'S PROPOSED STATEMENT OF THE CASE (Post-Voir Dire)

2 The First Superseding Indictment ("Indictment") charges Gabriel  
3 Zendejas-Chavez with violations of federal criminal law. The  
4 Indictment is not evidence. Mr. Zendejas-Chavez has entered a plea  
5 of not guilty and is presumed innocent of the charges against him.  
6 The Indictment alleges that Mr. Zendejas-Chavez conspired with others  
7 to conduct or to participate in the affairs of the Mexican Mafia's  
8 Los Angeles County Jail System ("LACJ") Enterprise through a pattern  
9 of racketeering activity, including acts involving extortion and drug  
10 trafficking.

11       Mr. Zendejas-Chavez is a defense attorney. The Indictment  
12   alleges that Mr. Zendejas-Chavez acted as a facilitator, that is, a  
13   highest-level associate, for two Mexican Mafia members who controlled  
14   the Mexican Mafia LACJ Enterprise and would act with the authority of  
15   those members in directing the criminal activities of the Mexican  
16   Mafia LACJ Enterprise, including extortion and drug sales. In  
17   particular, the Indictment alleges that Mr. Zendejas-Chavez would use  
18   his position as an attorney to assist Mexican Mafia Member Jose  
19   Landa-Rodriguez, another now-deceased Mexican Mafia member, and other  
20   members of the LACJ Enterprise, with criminal activities.

21 Mr. Zendejas-Chavez is charged in four counts of the Indictment.  
22 Count One charges Mr. Zendejas-Chavez with conspiring to violate the  
23 federal Racketeer Influenced and Corrupt Organizations Act, also  
24 known as "RICO."

25 Count Five charges Mr. Zendejas-Chavez with conspiring to  
26 distribute methamphetamine, heroin, cocaine, and marijuana. Count  
27 Five further alleges that the overall conspiracy, to which Mr.  
28 Zendejas-Chavez is alleged to have been a member, involved the

1 following:

2 (1) at least 500 grams of a mixture and substance containing a  
3 detectable amount of methamphetamine;  
4 (2) at least 50 grams of methamphetamine;  
5 (3) at least 100 grams of a mixture and substance containing a  
6 detectable amount of heroin;  
7 (4) cocaine; and  
8 (5) marijuana

9 Count Seven charges Mr. Zendejas-Chavez with aiding and abetting  
10 the possession with intent to distribute of approximately 7.75 grams  
11 of methamphetamine.

12 Count Eight charges Mr. Zendejas-Chavez with aiding and abetting  
13 the possession with intent to distribute of approximately 2.37 grams  
14 of a mixture and substance containing a detectable amount of heroin.

15 Once again, the Indictment is not evidence. Mr. Zendejas-Chavez  
16 has entered a plea of not guilty and is presumed innocent of the  
17 charges against him.